TELAS DEPARTMENT OF WATER RESOLACES

1700 N. Congress Avenue Austin, Texas

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TEXAS WATER COMMISSION

Mr. Jim Hackfeld

Austin Community Disposal Co.

P. O. Box 14644 Austin, Texas

78761 LDFL. TND 210 549 426

Schroeder Ans Miertschine Whittington W

Davis &

Lewis KL

Dear Mr. Hackfeld:

Austin Community Disposal Co.

Permit No. 249

On March 13, 1981 a proposal for remedial work at the closed Industrial Waste Materials Management, Inc. (IWMM) site was submitted to the Texas Department of Water Resources (TDWR) by Austin Community Disposal Co. and Pittman Engineering Co. Review of the plans and specifications indicates that if carried out as proposed and the items below are incorporated in the plan, existing problems at the site should be alleviated.

Additions and modifications to the plan are as follows:

Waste Site Expansion is approved, remedial work on areas with limited access will be completed within 90 days of permit approval. In the event that the site expansion is denied, Austin Community Disposal Co. (ACDC) will, within thirty days of the date of denial, submit to the Executive Director an alternative plan for securement of Drum Site 1. Those areas where access is not limited shall receive a minimum of two feet of compacted clay cap meeting the specifications set forth in the proposal, and will be resloped, topsoiled, and revegetated by July 1, 1981 as proposed.

Drum Disposal Site #1 - If the proposed Municipal Solid

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- 2. Drum Disposal Site #2 - Proposed improvements should be completed by July 1, 1981 as proposed.
- Drainage Channels Proposed slope modifications on the south and west sides of Drum Disposal Site 2 are inadequate to achieve effective erosion control. In order to more adequately secure the site and minimize long term site maintenance requirements, additional plans for erosion protection along channels flanking Drum Site 2 shall be submitted to the Executive Director within 45 days of the date of this letter. RECEIVED

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4. Monitoring Program - Monitoring stations shall be in Channel A with one located upstream of the IWMM site, one located at the southern ACDC property line and a third station at the junction of Channels A and B. At each location, facilities shall be provided for collection of shallow underflow waters (one to six feet below stream bed elevation). Both surface and shallow ground waters will be sampled during the first quarterly sampling. Thereafter, underflow waters will only be sampled when surface water is unavailable at the sampling point. Initial monitoring samples will be collected within forty-five days of the date of this letter.

In addition to the proposed monitoring parameters each sample should also be analyzed for chromium and copper. Samples will be collected on a quarterly basis until four years after final closure of all ACDC municipal waste disposal facilities with results of analyses being submitted to TDWR District 3 office within thirty days of each sampling.

- 5. Construction Certification ACDC shall submit in writing, certification that all facility components have been constructed in accordance with specifications set forth in the proposal presented to TDWR on March 13, 1981 except as modified herein. Certification shall be prepared and sealed by a professional engineer with current registration pursuant to the Texas Engineering Practice Act.
- office in Waco shall be notified in writing upon completion of each phase of remedial work. Additionally, TDWR District 3 office shall be notified at least 5 days prior to collection of the first set of monitoring samples to provide the opportunity to split samples.
- Austin Community Disposal Company will regularly inspect and maintain the integrity of the clay cover on the IWMM site.

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ATTACHMENT

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Mr. Jim Hackfeld Page 3

If you have any questions, please call Mr. Russell Lewis of our Industrial Wastewater and Solid Waste Section at a.c. 512/475-5516.

Sincerely yours,

Harvey Davis Executive Director

Mr. Dwight L. Pittman, P.E.

Pittman Engineering Co. Mr. J. C. Carmichael, Texas Department of Health

TDWR District 3 Office

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